IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

AMAZON.COM, INC and AMAZON DATA SERVICES, INC.,) Case No. 1:20cv484
Plaintiffs, v.	Hon. Rossie D. Alston, Jr. Hon. Theresa Buchanan
WDC HOLDINGS LLC d/b/a NORTHSTAR COMMERCIAL PARTNERS, et al.,))))
Defendants,) UNOPPOSED MOTION FOR) EXTENSION OF TIME TO FILE OPPOSED OF THE CONTROL OF THE
800 HOYT LLC, Intervening Interpleader Plaintiff,	OBJECTIONS TO ORDER GRANTING PROTECTIVE ORDERS (Doc. 577)
v.)))
BRIAN WATSON, WDC HOLDING LLC, PLW CAPITAL I, LLC.AMAZON.COM, INC, and AMAZON DATA SERVICES, INC.	,)))
Interpleader Defendants.))))

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Defendant Carleton Nelson ("Nelson") files this Motion for extension of time to file objections to the Order entered by the U.S. Magistrate Judge granting Plaintiffs' motions for entry of a protective order precluding the depositions of various Amazon employees and former employees, including Peter DeSantis, Andy Jassy, and Dennis Wallace. Doc. 577. Following a hearing on March 11, 2022, the Court entered its Order granting Plaintiffs' motions later that day. *Id.* Pursuant to Fed. R. Civ. P. 72(a), a party has fourteen (14)

days to file objections to such a non-dispositive order. Accordingly, the current deadline to file objections to the Order is March 25, 2022.

Fed. R. Civ. P. 6(b) provides in pertinent part that "[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time . . . with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires " Here this request is being made before the time to file objections expires.

Nelson intends to file objections to the Order. The Order entered by the Court provided that Plaintiffs' motions were being granted "for the reasons stated from the bench, and in accord with specific rulings and instructions thereto." Doc. 577. Thus, in order to prepare his objections, Nelson requested a copy of the transcript of the hearing from the Clerk's office. Nelson was informed by the Clerk's office that because there was no court reporter for the hearing in question, the hearing was on tape and a transcript would need to be ordered, which could take up to 30 days to prepare. Nelson was informed that there was no method to request an expedited transcript. Nelson placed said order via the instructions provided, but is without further information at this time concerning when the transcript will be finalized.

Because the specific reasons for granting the motions in question were stated on the record, but not expressly set forth in the written order entered on March 11, 2022, Nelson requests that the Court extend the time for filing objections to the order under Fed. R. Civ. P. 72(a) until three business days after Nelson receives a copy of the transcript from the March 11, 2022 hearing. Nelson does not wish to delay this issue any longer than is necessary to receive the transcript in question, and thus, to the extent the extent the Court is willing and able to Order that the transcript be produced on a more expedited basis, Nelson respectfully requests that that Court do so.¹

¹ Of course Nelson is willing to pay the fees incurred for such expedited processing of the transcript.

Nelson asked Plaintiffs wither they opposed the requested extension of time and they confirmed that they do not oppose the requested extension.

WHEREFORE, Nelson requests that the Court enter an Order extending the time to file objections to the Order entered by the U.S. Magistrate Judge on March 11, 2022 (Doc. 577), which granted Plaintiffs' motions for entry of a protective order barring the deposition testimony of certain Amazon employees, until three business days after the transcript of the hearing on the motions is produced to Nelson.

March 23, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2022, a true and correct copy of the foregoing has been

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